

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff,                 )  
                                )  
v.                            ) No. 4:22 CR 601 AGF (SPM)  
                                )  
KEVIN WEST JR.,            )  
                                )  
Defendant.                 )

**MOTION FOR PRETRIAL DETENTION AND HEARING**

The United States of America, by and through its Attorneys, Sayler Fleming, United States Attorney for the Eastern District of Missouri, and Linda Lane, Assistant United States Attorney for the District, moves the Court to order Defendant detained pending trial. The United States further requests that a detention hearing is held three days from the date of his initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1.     Defendant is charged with interference with commerce by threats or violence, in violation of Title 18, United States Code, Section 1951; and possessing and brandishing a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).
2.     Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. According to Florissant Police Department complaints, between May 26, 2021 and January 28, 2022, Defendant committed at least seven robberies of restaurants and stores in Florissant, Missouri, armed with a firearm. Defendant admitted to each of the robberies.

4. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial and further order a detention hearing three days from the date of his initial appearance.

Respectfully submitted,

SAYLER FLEMING  
United States Attorney

*s/LINDA R. LANE*  
LINDA LANE, #0011451IA  
Assistant United States Attorney